



Iowa department of environmental quality

September 23, 1980

reply to: Ronald L. Kolpa
phone: 515/281-8925

pm

Sheller-Globe Corporation
3200 Main Street
Keokuk, IA 52632

ATTENTION: Michael Stone, P.E.

Dear Mr. Stone:

Thank you for affording Messrs. Vlieger, Hoambrecker and me the opportunity to meet with you and your staff regarding the "Grimes property". As I had indicated at that meeting, Mr. Hoambrecker and I found no immediate problems during our inspection earlier that day. Nevertheless, certain areas need more formal documentation and certification before they can be resolved. We recognize a willingness on your part to pursue these issues. Consequently, I have identified below the particular documentation which we believe to be critical.

1. Groundwater Contamination: Certainly of critical importance is the integrity of the recently installed well and the quality of the recovered water. Documentation under this point should include:
 - a. identification of hydrogeology of the area (Iowa Geological Survey stratigraphic maps, well driller's logs, soil core samples, etc.)
 - b. identification of direction of flow of all major use aquifers, in particular that aquifer from which the Grimes' well draws
 - c. driller's log for the Grimes well (specifics on well construction and depth)
 - d. water sample recovery from the Grimes well and (at least) one other private well immediate to and upgradient (with respect to aquifer) of the Grimes well
 - e. well water analysis for appropriate parameters (see later discussion).
2. Waste characterization: As you recognize company records are incomplete in terms of quantity and types of materials delivered to the site over its lifetime. Interviews with senior employees and a review of production records appear to be the only logical method of documenting disposal activities. Your efforts in this area should lead to a certification statement on materials disposed. You should also provide your best engineering judgement as to the present or future threats posed by the site.

AQ-SS-1-L8



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RCRA RECORDS CENTER

Main Office: Henry A. Wallace Building, Des Moines, Iowa 50319

Regional Office #1
209 N. Franklin St.
Manchester 52057

Regional Office #2
509 S. President
P.O. Box 1443

Regional Office #3
401 Grand Ave.
P.O. Box 270

Regional Office #4
316 Walnut
Atlantic 50022

Regional Office #5
317 E. 5th St.
P.O. Box 6160

Regional Office #6
117 N. 2nd Ave.
P.O. Box 27

3. Site remedial action: Our inspection revealed numerous areas on the site where waste materials are exposed. During our meeting, it was mentioned that Sheller-Globe would be receptive to the idea of assisting the present property owner in minor covering and regrading work. Certainly covering the exposed waste will eliminate its future accidental or purposeful burning and will minimize any surface or rainwater interaction with the waste. While we do not require such assistance from you, we do encourage it.

Regarding well water sampling and analysis, we recommend approaching this in phases. Samples should be taken from the Grimes well, from the nearest upgradient well, and from any casual water found in ravines or ditches bounding the site. Analyses should be for the following parameters:

arsenic	cadmium
barium	nitrates
chromium	Kjeldahl nitrogen
lead	total organic carbon (TOC)
mercury	phenols
selenium	volatile chlorinated organics
silver	

The above parameter list is to be considered exhaustive. Depending on your success in item #2 above, you may be able to justify elimination of many of the metals (e.g. if you certify that no arsenic compounds were ever deposited at the site, you may eliminate arsenic from the parameter list). Please note that sample preservations for these various parameters are mutually exclusive. Be sure and discuss sample recovery methods with your analytical service prior to sampling. Please provide us with a copy of the analytical results and documentation of the sampling methods used.

Of particular importance in the results will be comparisons of background and Grimes' well samples in Kjeldahl nitrogen, total organic carbon, phenols and volatile chlorinated organics. A second, more chemically specific, analysis should be considered if any of these parameters from the Grimes well sample are significantly above background.

AQ-SS-1-L9

Sheller-Globe Corporation

Page 3

September 23, 1980

Finally, we will be communicating with Mr. Grimes and soliciting his cooperation regarding well sampling. You will be copied. Please review the above suggestions and contact me with any questions. In particular, if you or your laboratory have questions regarding sampling or analyses, please don't hesitate to contact me. At your earliest convenience, please provide us with a tentative schedule of your activities.

Thank you again for your cooperation.

Sincerely,

AIR AND LAND QUALITY DIVISION

RLK

Ronald L. Kolpa
Chief, Hazardous Waste Planning

RLK:mla

AQ-SS-1-L10

cc: Steve Hoambrecker, DEQ Regional Office No. 6, Washington